

David R. Kott, Esq.  
Joseph G. Braunreuther, Esq.  
Four Gateway Center  
100 Mulberry Street  
Newark, NJ 07102  
(973) 622-4444  
(973) 624-7070 FAX

[Additional Counsel on Signature Page]

*Counsel for Kenvue Inc., Johnson &  
Johnson, Thibaut Mongon, Paul Ruh, and  
Heather Howlett*

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

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In re KENVUE INC. SECURITIES  
LITIGATION

This document relates to: ALL CASES

Civil Action Master File No.  
3:23-cv-20998-ZNQ-JBD

Honorable Zahid N. Quraishi  
Honorable J. Brendan Day

**STIPULATION AND SCHEDULING  
ORDER SETTING DEADLINES FOR  
FILING A CONSOLIDATED  
COMPLAINT AND BRIEFING ANY  
MOTION(S) TO DISMISS**

WHEREAS, on January 3, 2024, the Court entered a Stipulation and Scheduling Order providing, among other things, that by January 11, 2024, Defendants and Lead Plaintiff (collectively, the “Parties”) shall confer and jointly submit a proposed schedule for Lead Plaintiff to file a consolidated complaint and for Defendants to answer or otherwise respond, including a briefing schedule with respect to any anticipated dispositive motion (Dkt. No. 35);

WHEREAS, the Parties have conferred regarding a proposed schedule;

WHEREAS, given the complexity of the issues involved in this consolidated securities class action, the need for coordination between the twenty-four Defendants and their multiple

counsel, and taking into account the respective schedules of the Parties and their counsel, as well as similar scheduling orders entered in other securities class actions.

NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED by the Parties, through their counsel and subject to Court approval:

1. Lead Plaintiff shall have until **March 12, 2024** to file a Consolidated Complaint;
2. Defendants shall have until **May 13, 2024** to answer or otherwise respond to the Consolidated Complaint;
3. Lead Plaintiff shall have until **July 12, 2024** to respond to any motion(s) to dismiss the Consolidated Complaint; and
4. Defendants shall have until **August 26, 2024** to reply in support of any motion(s) to dismiss the Consolidated Complaint.

**GRANTED. Given the protracted briefing schedule, the parties are to refrain from filing their briefs on the deadlines set forth above. They are instead to serve their briefs on each other on those dates, and to file all briefs, together with a notice of motion, on the deadline to file replies.**

Dated: January 10, 2024

  
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Hon Zahid N. Quraishi  
United States District Judge

We hereby consent to the form and entry of the within stipulation and scheduling order setting deadlines for filing a consolidated complaint and briefing any motion(s) to dismiss.

Dated: January 9, 2024

/s/ Donald A. Ecklund

**CARELLA, BYRNE, CECCHI, OLSTEIN,  
BRODY & AGNELLO, P.C.**

James E. Cecchi, Esq.  
Donald A. Ecklund, Esq.  
Kevin G. Cooper, Esq.  
5 Becker Farm Road  
Roseland, NJ 07068  
(973) 994-1700  
(973) 994-1744 FAX

*Liaison Counsel for Lead Plaintiff Joseph Ditta and Liaison Counsel for the Class*

**GLANCY PRONGAY & MURRAY LLP**

Robert V. Prongay, Esq.  
Charles H. Linehan, Esq.  
Pavithra Rajesh, Esq.  
1925 Century Park East, Suite 2100  
Los Angeles, California 90067  
(310) 201-9150

*Counsel for Lead Plaintiff Joseph Ditta and Lead Counsel for the Class*

Dated: January 9, 2024

/s/ David R. Kott

**MCCARTER & ENGLISH, LLP**

David R. Kott, Esq.  
Joseph G. Braunreuther, Esq.  
Four Gateway Center  
100 Mulberry Street  
Newark, NJ 07102  
(973) 622-4444  
(973) 624-7070 FAX

**SIDLEY AUSTIN LLP**

Kristen R. Seeger, Esq. (*pro hac vice*)  
John M. Skakun III, Esq. (*pro hac vice*)

Christopher Y. Lee, Esq. (*pro hac vice*)  
Takayuki Ono, Esq. (*pro hac vice*)  
One South Dearborn  
Chicago, IL 60603  
(312) 853-7000  
(312) 853-7036 FAX

*Counsel for Defendants Kenvue Inc., Johnson & Johnson, Thibaut Mongon, Paul Ruh and Heather Howlett*

Dated: January 9, 2024

/s/ Isaac Ashkenazi

**PAUL HASTINGS LLP**

Isaac Ashkenazi, Esq.  
Barry Sher, Esq.  
Kevin Broughel, Esq.  
200 Park Avenue  
New York, NY 10166  
(212) 318-6000  
(212) 230-7807 FAX

*Counsel for Defendants Goldman Sachs & Co. LLC, J.P. Morgan Securities LLC, BofA Securities, Inc., Citigroup Global Markets Inc., Deutsche Bank Securities Inc., HSBC Securities (USA) Inc., RBC Capital Markets, LLC, BNP Paribas Securities Corp., UBS Securities LLC, BBVA Securities Inc., Ing Financial Markets LLC, Intesa Sanpaolo S.P.A., Santander US Capital Markets LLC, Unicredit US Capital Markets LLC, Academy Securities, Inc., Independence Point Securities LLC, Samuel A. Ramirez & Co. Inc., R. Seelaus & Co., LLC, and Siebert Williams Shank & Co. LLC*